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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

SYNOPSYS, INC.,

Plaintiff,

v.

RICOH COMPANY, LTD.,

Defendant.

**CASE NO. C-03-2289-MJJ**

**CASE NO. C-03-4669-MJJ**

RICOH COMPANY, LTD.,

Plaintiff,

v.

AEROFLEX INCORPORATED, et al.,

Defendants

**STIPULATION AND [PROPOSED] ORDER  
CONFORMING CERTAIN DATES TO  
EXISTING SECOND AMENDED PRE-  
TRIAL SCHEDULE**

1. Ricoh Company, Ltd., Synopsys, Inc., and Defendants Aeroflex, Inc., et al. (collectively “the Parties”), hereby stipulate to proposed schedule, and request that the Court modify its Second Amended Pre-trial Order in accordance with the stipulated proposed schedule.

2. Based on the progress of this case, the Parties, on November 16, 2005, submitted a Joint Stipulation and Request to Modify the Second Amended Pre-trial order, which this Court entered on November 22, 2005. That Stipulation and Proposed Order omitted certain items. This Stipulation and Order maintains the Trial and Pretrial Conference dates, but includes the omitted dates which are set out below.

3. IT IS HEREBY STIPULATED AND AGREED by and between the Parties that the case schedule be changed to the following:

Event	Date pursuant to existing order	New date
Close of general fact discovery (responses due by this date)	5/30/2006	5/30/2006
Deadline for additional 30(b)(6) depositions relating to Judge Chen’s May 8, 2006 Order		6/9/2006
Settlement Conference with Judge Spero		6/6/2006 @ 9:30
Last day to file discovery motions re general discovery deadline and non-deposition document discovery provided for in Judge Chen’s May 8, 2006 Order	6/7/2006	6/07/2006
Service of proposed stipulations resolving various discovery issues		6/09/2006
Last day to file discovery motions re (1) additional 30(b)(6) depositions, including document-related issues identified at the depositions relating to Judge Chen’s May 8, 2006 Order; (2) Ricoh’s responses to Matrox Tech’s 4/17/06 interrogatories; and (3) any issues relating to the stipulations exchanged on 6/9/06		6/15/2006
Opening expert reports due: 1. Ricoh’s report(s) on infringement; 2. Ricoh’s report(s) on damages; 3. Synopsys and the Customer Defendants’ report(s) on invalidity; 4. Synopsys and the Customer Defendants’ report(s) on unenforceability; and 5. Synopsys and the Customer Defendants’ report(s) on other affirmative defenses, except that noninfringement and any damages related issues will be addressed in responsive reports	6/19/2006	6/19/2006
No non-emergency filings or communications between parties due to DSMO office move		6/30/06, 6:30 pm ET to 7/10/06, 9 am ET
Responsive expert reports due	7/19/2006	7/19/2006
Close of Expert discovery	8/18/2006	8/18/2006

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Event	Date pursuant to existing order	New date
Dispositive motions due	8/18/2006	8/18/2006
Opposition briefs to Dispositive motions		9/01/2006
Reply briefs in support of Dispositive motions		9/08/2006
Dispositive Motion hearing	9/26/06 @ 9:30	9/26/06 @ 9:30
Mutual exchange of proposed jury instructions; deposition designations in electronic form; draft pre-trial statement.		10/2/2006
Mutual exchange of counter deposition designations in electronic form.		10/11/2006
Mutual exchange of objections to jury instructions; and objections to deposition designations and counter-designations in electronic form.		10/16/2006
Mutual exchange of proposed preliminary statements / instructions and proposed separate jury instructions; witness lists, exhibit lists		10/18/2006
Meet and confer regarding jury instructions; pretrial statement; and deposition designations.		10/20/2006
File Pre-Trial Statement, including witness lists, exhibit lists, and deposition designations; File Joint Set of Agreed Proposed Jury Instructions.	6/21/2006	10/25/2006
Mutual exchange of objections to witness lists, exhibit lists, and separate jury instructions. File motions in limine.		10/25/2006
Meet and Confer regarding proposed trial exhibits and other evidence, separate jury instructions, proposed preliminary instructions		10/27/2006
File List of Exhibits and Deposition Designations w/ Stipulations And Objections to Evidence; Proposed Voir Dire and Verdict Forms; Objections to Proposed Separate Jury Instructions	6/27/2006	10/30/2006
File Oppositions to Motions In Limine		11/6/2006
Submissions Of Copies Of Exhibits To Court	7/17/2006	11/13/2006
Pre-trial Conference	11/14/06 @ 3:30	11/14/06 @ 3:30
Submission Of Joint Preliminary Statements/Instructions	7/17/2006	11/20/2006
Trial	11/27-12/15/06	11/27-12/15/06

The Parties request that the Court modify its Second Amended Pre-trial order to adopt the dates set forth above.

1 Dated: June 8, 2006

DICKSTEIN SHAPIRO MORIN & OSHINSKY

2  
3 By: /s/ Kenneth W. Brothers  
4 Gary M. Hoffman  
5 Kenneth W. Brothers  
Attorneys for Ricoh Company, Ltd.

6 Dated: June 8, 2006

HOWREY, LLP

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8 By: /s/ Denise De Mory  
9 Teresa M. Corbin  
10 Denise De Mory  
Attorneys for Defendants and Synopys

11 SO ORDERED:

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14 By: \_\_\_\_\_  
United States Magistrate Judge

15 Dated: June \_\_, 2006